

Tabula Corporate Responsibility and Sustainable Investing Policy

Tabula is committed to the highest ethical and professional standards. As our business grows, we want to ensure that sustainability and good governance are embedded in everything we do. We have set up an ESG Committee with representation from across the company and senior management, including the CEO, CIO, CCO and CFO. This Committee meets monthly and is responsible for defining and implementing our approach across three key areas:

How we manage investments. Tabula became a signatory to the UN-supported Principles for Responsible Investment in May 2020 and is committed to implementing those principles. See our Sustainable Investing Policy below for more information.

How we run our company. We aim to reduce the negative impacts of our day-to-day operations as far as possible. This includes minimising travel, offsetting essential travel through Carbon Footprint Ltd and improving the recycling facilities and energy efficiency in our offices. We are also actively committed to building a diverse workforce and creating a working environment that promotes diversity and inclusion in all its forms.

How we interact with the community. Tabula is proud to support a range of charities, both local and international, with both financial and practical support.

Sustainable Investing Policy

Tabula became a signatory to the UN-supported Principles for Responsible Investment (PRI) in May 2020 and is committed to integrating sustainability, sustainability-related risks and ESG considerations in our investment processes wherever possible.

Tabula's fund range currently comprises 1) passive funds and 2) active funds taking exposure to credit index products. In accordance with the investment objectives of the funds, we therefore have limited ability to include or exclude specific securities or exposures and therefore do not manage sustainability impacts and sustainability risks on a day-to-day basis.

Our approach to sustainability varies from fund to fund. However, we apply some general principles as follows:

1. Sustainability in index design

Where possible and practical for a particular market or exposure, we work with index providers to incorporate sustainability criteria in index methodologies for our passive funds, with the aim of reducing negative impacts on sustainability factors and/or mitigating sustainability-related risks. These criteria could include, but are not limited to:

- Exclusions of issuers violating established norms such as the UN Global Compact or OECD Guidelines for Multinational Enterprises
- Exclusion of issuers involved with certain harmful business activities e.g. controversial weapons, tobacco, thermal coal
- Overweighting of issuers with good or improving ESG ratings (and vice versa)



• Specific sustainable objectives (e.g. emissions reduction targets for our Paris-Aligned ETFs)

Information on the index methodologies for individual funds is provided in the relevant Supplement under "Investment Policy" and "Investment Strategy" and, for funds classified as Article 8 or Article 9 under SFDR, in the Annex to the Supplement.

2. Ongoing engagement with index providers

We regularly encourage index providers to incorporate sustainability and ESG criteria into the index methodologies and their practice. To this end, our CIO is a member of the index/ESG committees of a number of index providers.

3. Regular reviews of index methodologies

We regularly engage with index providers to propose upgrades to the exclusions, business involvement screens and other ESG criteria applied in the indices we use in our fund range, to ensure that they capture evolving investor expectations and industry practice.

4. Engagement with corporate issuers

Tabula is a provider of fixed income funds. As such, we do not have equity voting rights. However, we aim to be a responsible asset manager by participating in collaborative engagements with other investors.

Tabula is a member of the Institutional Investors Group on Climate Change and a signatory to Climate Action 100+. We are actively involved with collaborative engagements via both these organisations and aim to further the objectives of both the Paris Agreement and the Task Force on Climate-Related Financial Disclosures.

5. Preference for green, social or sustainability-linked bonds

Where consistent with a fund's investment objective and practical to do so, the Investment Manager may prioritise green, social or sustainability-linked bonds over other bonds from the same issuer.

6. Minimum standards for government bond collateral

Where Tabula funds hold government bonds as collateral or for cash management purposes (for example, in funds using credit derivatives), these bonds are screened to ensure compliance with EU sanctions, UN sanctions and Freedom House Global Freedom Status.



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